

To: webmail@oc.fda.gov  
From: IPS Automation <brian@ipsauto.com.au>  
Subject: Labelling of foods which have been irradiated  
Cc:  
Bcc:  
X-Attachments:

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Dockets Management Branch (HFA-305)  
Food & Drug Administration  
5630 Fishers Lane, Room 1061,  
Rockville, Maryland, 20852  
United States of America.

Re Docket No. 98N-1038, Irradiation in the Production,  
Processing and Handling of Food.

Dear Sir/Madam,

I am an Australian citizen who has been involved with consumer advocacy work since 1975. During that time I have taken a particular interest in all matters pertaining to food - its safety, processing, storage, transportation and most especially labelling.

I have recently been made aware of the call for comments by the United States Food and Drug Administration on (a) whether labelling of irradiated foods should remain and (b) if so, what kind of label is appropriate.

I am also aware that whatever decision is taken by the United states, has implications for the rest of the signatories to the World Trade organisation, of which Australia is one. Therefore I am taking this opportunity to acquaint you with my views.

Before the Australian standard was drawn up there were not only rounds of consultations undertaken by post, but also a seminar arranged to which people with various views were invited. I was fortunate in being able to attend this public forum. From this meeting it was decided to draw up a standard with approval for irradiation to be granted on a case-by-case basis. It was shown by the many surveys undertaken at the time that the overwhelming majority of people in this country wanted foods treated by irradiation to be labelled as such. This is still the situation. In addition it was considered that the radura symbol was a means whereby people could quickly ascertain whether a food was irradiated or contained an irradiated ingredient.

Your own late President, John F. Kennedy, was responsible for empowering consumers with a list of rights which are now recognised world wide. One of those rights was the right to know, the right to be given sufficient information to be able to make an informed choice. If the United States removes from labels information indicating that a particular food/ingredient has been irradiated, that right will be

violated. I support the recommendation by the Centre for Science in the Public Interest (CSPI) with regard to irradiated foods, i.e. 'any foods, or foods containing ingredients that have been treated by irradiation, should be labelled with a written statement on the principal display panel indicating such treatment. The statement should be easy to read and placed in close proximity to the name of the food and accompanied by the International symbol. If the food is un-packaged, this information should be clearly displayed on a poster in plain view and adjacent to where the product is displayed for sale.'

It naturally follows that all labels should be truthful and not misleading. Labels advising food has been irradiated are not absolved from this requirement. An omission (of the fact that a food has been irradiated) is misleading. Language is also important. The public knows what the term 'irradiation' denotes and labels should state either, 'treated by irradiation' or 'treated with ionising radiation'. The use of such terms as 'pasteurisation' whether qualified by 'cold' or not is misleading as people have a completely different understanding of pasteurisation which does not include irradiation. The use of the radura symbol is also well known as indicating that food or an ingredient of the food has undergone irradiation.

There will always be new consumers entering the market and therefore there will always be a need for labelling of irradiated foods. There should be no sunset clause in this regard. I understand that 77% of the American people want labelling of foods so treated. I can assure you that in Australia the figure would be even higher. The requirement of the public for accurate labelling of irradiated food should remain paramount. To not do so would be to mislead the public into believing they were consuming food which has not been irradiated.

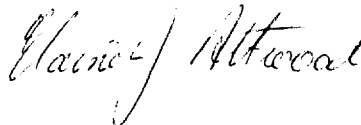
I would also request that the FDA place copies of the comments received on this matter on the Internet so that Australians as well as other interested consumers world wide, are kept informed of the views being expressed and by whom.

Although I write today in a personal capacity, the Consumers Association of South Australia Inc., and the Women's group that I belong to in this state, both support full disclosure on labelling. This includes when a food or ingredient has been irradiated.

Thank you for the opportunity to comment on this very important matter.

Yours sincerely,

Elaine J. Attwood



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Consumer Advocate.

*Brian J. Alwood*

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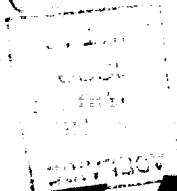
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